

STATE OF MICHIGAN CIRCUIT COURT FOR THE COUNTY OF OAKLAND	NOTICE OF REMOVAL OF PROCEEDING TO UNITED STATES BANKRUPTCY COURT PURSUANT TO FED. R. BANKR. P. 9027	CASE NO. 2013-136635-CH
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Court address: 1200 N Telegraph Rd. Pontiac, MI

Court telephone no. (248) 858-0345

Plaintiff name(s) and address(es) HOME VENTURES ENTERPRISES, LLC 4301 Orchard Lake Rd., Suite 180 West Bloomfield, MI 48323	v	Defendant's name(s) and address(es) RALPH ROBERTS REALTY, LLC, RALPH R. ROBERTS and HEATHER ELISAZ
Plaintiff(s) attorney, bar no., address, and telephone no. Blake P. Lipman (P52652) Law Offices of Blake P. Lipman 31275 Northwestern Hwy., Suite 140 Farmington Hills, MI 48334 (248) 851-3171		Defendant(s) attorney, bar no., address, and telephone no. FOR BANKRUPTCY PURPOSES ONLY: Hannah Mufson McCollum (P67171) Gold, Lange & Majoros, P.C. 24901 Northwestern Hwy., Suite 444 Southfield, MI 48075 (248) 350-8220

PLEASE TAKE NOTICE THAT:

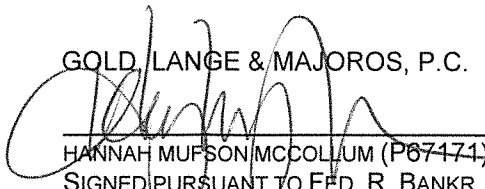
Ralph Roberts Realty, LLC and Ralph R. Roberts (collectively, the "Debtors") filed voluntary petitions for relief under Chapter 11 of Title 11 of the United States Code (the "Bankruptcy Code") on May 25, 2012 (the "Petition Date") in the United States Bankruptcy Court for the Eastern District of Michigan, Southern Division (the "Bankruptcy Court") which were jointly administered under case no. 12-53023. The Debtors' Fifth Amended Combined Plan of Reorganization and Disclosure Statement (the "Fifth Plan") was confirmed by order of the Bankruptcy Court on February 11, 2013. Pursuant to Rule 9027 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), the Debtor may remove a civil action from the district and division where it was pending as of the Petition Date to a state or federal court of its choice.

The Debtors are removing the above-captioned matter (the "Litigation") in its entirety, including all non-debtor parties thereto, to the Bankruptcy Court pursuant to Bankruptcy Rule 9027. The Debtor believes that removal of the Litigation in its entirety is appropriate for the following reasons: (1) the Litigation seeks a judgment against the Debtors that is barred by the automatic stay, (2) the Litigation seeks a judgment against the Debtors that is barred by the injunction contained in the Fifth Plan, (3) the Litigation seeks a judgment against the Debtors that is barred because the Plaintiff did not file a timely claim against the Debtors, (4) the Litigation seeks a judgment against one of the Debtors' employees acting solely in her capacity as agent for the Debtors, and (5) the Litigation seeks a judgment against property of the bankruptcy estate. Pursuant to the terms of the Fifth Plan, the Bankruptcy Court retains jurisdiction over the relief sought in the Litigation, and the Bankruptcy Court is quite familiar with the Debtors, their business operations, assets, and, as a result of similar action by the Debtors against other parties, the claims raised in the Litigation. Accordingly, the Debtors are removing the Litigation in its entirety.

Upon removal, Debtors believe that the Litigation will constitute a core proceeding. Pursuant to 28 U.S.C. section 157, a proceeding is core if it concerns the administration of the estate, the allowance or disallowance of claims against the estate, counterclaims by the estate against persons filing claims against the estate or orders to turn over property of the estate, determinations of the validity, extent or priority of liens (among others). In this case, the Litigation concerns the allowance or disallowance of Plaintiff's claim, if any, against the Debtors, the Debtors' claims against the Plaintiff, and the Debtors' potential right to the turnover of funds or other property of the estate.

The Debtors consent to the entry of final orders and judgments by the Bankruptcy Court.

Dated: October 17, 2013

GOLD, LANGE & MAJOROS, P.C.

HANNAH MUFSON MCCOLLUM (P67171)
SIGNED PURSUANT TO FED. R. BANKR. P. 9011
Bankruptcy Attorneys for Ralph Roberts Realty, LLC
24901 Northwestern Hwy., Suite 444
Southfield, MI 48075
(248) 350-8220
hnmccollum@glmpc.com

[Case Summary](#)[Printer Friendly Version](#)[Home](#)

Case Number 2013-136635-CH HOME VENTURES ENTERPRISES vs. RALPH ROBERTS REALTY

Judge Name LEO BOWMAN

Case Filed 10/08/2013

Case Disposed

Case E-filed YES

Register of Actions[View Parties](#)[New Search](#)

Date	Code	Description
10/08/2013	C	COMPLAINT FILED
10/08/2013	SI	SUMMONS ISSUED

[Order Document](#)
[Order Document](#)

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This case has been designated as an eFiling case. To review a copy of the Notice of Mandatory eFiling visit www.oakgov.com/clerkrod/efiling.

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF OAKLAND

HOME VENTURES ENTERPRISES, LLC,
a Michigan Limited Liability Company,

Plaintiff,

vs.

Case No. 2013-136635 -CH

RALPH ROBERTS REALTY, LLC, a
Michigan Limited Liability Company,
RALPH ROBERTS, Individually, and
HEATHER ELIASZ, Individually,

HON. JUDGE BOWMAN

Defendants.

_____/

BLAKE P. LIPMAN (P-52652)
Attorney for Plaintiff
31275 Northwestern Hwy., Ste. 140
Farmington Hills, MI 48334
(248) 851-3171

COMPLAINT

NOW COMES the Plaintiff, HOME VENTURES ENTERPRISES, LLC, by and through its attorney, BLAKE P. LIPMAN, and for its Complaint state the following:

1. That the Plaintiff is a Michigan Limited Liability Company whose principal place of business is in the City of West Bloomfield, County of Oakland, State of Michigan.
2. That the Defendant, RALPH ROBERTS REALTY, LLC, is a Michigan Limited Liability Company whose principal place of business is in City of Sterling Heights, County of Macomb, State of Michigan.
3. That the Defendant, RALPH ROBERTS, is a resident of City of Sterling Heights, County of Macomb, State of Michigan.

4. That the Defendant, HEATHER ELIASZ, is a resident of Clinton Township, County of Macomb, State of Michigan.

5. That jurisdiction is proper pursuant to MCR 3.411 and MCL 600.2932.

6. That Plaintiff, HOME VENTURES ENTERPRISES, LLC, is the owner of numerous properties, to wit: 1521 Annabelle, Ferndale, Michigan; 23230 Sherman, Oak Park, Michigan; 22332 Nancy, Southfield, Michigan; 21716 Hamilton, Farmington Hills, Michigan; 29115 Village, Southfield, Michigan; 1709 Annabelle, Ferndale, Michigan; 5609 Paradise, Commerce, Michigan; 21315 St. Francis, Farmington Hills, Michigan; 508 Dewey, Auburn Hills, Michigan; 566 E. Breckenridge, Ferndale, Michigan; 2190 Kircher, Auburn Hills, Michigan; and 2438 Willow Beach, Keego Harbor, Michigan, all more specifically described as follows:

The Easterly ½ of Lot 98, all of Lot 99; including ½ of the vacated public alley at the rear thereof, Mapledale Subdivision, as recorded in Liber 11, Page 14, of Plats, Oakland County Records. Property Tax Parcel ID: 25-26-154-034; Commonly Known As: **1521 Annabelle Street**

Lot 82 Fern Ridge Subdivision, as recorded in Liber 30, Page 8 of Plats, Oakland County Records. Property Tax Parcel ID: 25-28-377-007; Commonly Known As: **23230 Sherman Street**

The South ½ of Lot 14, Klett's Garden Estates Subdivision, as recorded in Liber 14, Page 56 of Plats, Oakland County Records. Property Tax Parcel ID: 24-32-128-016; Commonly Known As: **22332 Nancy Avenue Southfield, MI**

All that certain lot or parcel of land, more fully described and designated as Lot 342 in that part hereof known as Richland Gardens Subdivision, in the City of Farmington, Michigan and which said lot measures and is located as follows: North one-half of the vacated Liberty Avenue adjacent, Richland

Gardens Subdivision, as recorded in Liber 19, Page 29, Oakland County Records; Property Tax Parcel ID: 23-36-178-011; Commonly Known As: **21716 Hamilton Avenue**

Unit 7-D Building 7 Franklin Village Townhouse Condominium, according to the Master Deed recorded in Liber 5665, Page 282 as amended, Oakland County Records and designated as Oakland Condominium Subdivision Plan No. 23 together with rights in general common elements and limited common elements as set forth in the above described Master Deed and as described in Act 59 of the Public Acts of 1978, as amended' Property Tax Parcel ID: 24-08-378-055; Common Known As: **29115 Village Rd**

East 20 feet off lot 114 and the West 20 feet of Lot 115 and ½ vacated alley at the rear thereof, Mapledale Subdivision, of the East ½ of the Northwest 1/4 of section 26, Town 1 North, Range 11 East, Oakland County, Michigan, as recorded in Liber 11 of Plats, Page 14, Oakland County Records; Property Tax Parcel ID: 25-26-154-045; Commonly Known As: **1709 Annabelle Street**

Lots 9 through 12, Block 46, Carroll Lake Heights Subdivision Number 1, as recorded in Liber 29, Pages 1 through 1A of Plats, Oakland County Records; Property Tax Parcel ID: 17-03-401-012 & 17-03-401-011; Commonly Known As: **5609 Paradise Street**

Lot 564, Grand River Crest Subdivision No. 2, a recorded in Liber 30, Page 2 of Plats; Property Tax Parcel ID: 23-36-426-022; Commonly Known As: **21315 Saint Francis Street**

Lot 35, Royal Oak Manor Subdivision, according to the part thereof as recorded in Liber 17, Page(s) 7 of Plats, Oakland County Records; Property Tax Parcel ID: 25-15-128-003; Commonly Known As: **508 Dewey Street**

West 15 feet of Lot 7, all of Lot 8, Block 23, also one half of the vacated alley adjacent to the same – Urbanrest Subdivision, as recorded in Liber 4, on Page 22 of Plats, Oakland County Records; Property Tax Parcel ID: 25-27-484-009; Commonly Known As: **566 E. Breckenridge St**

The East 150 feet of the West 350 feet of Lot 56, of Galloway Lake Farms Subdivision, according to the Plat thereof, as recorded in Liber 31, Page 2 of Plats, Oakland County Records; Property Tax Parcel ID: 14-14-303-018; Commonly Known As: **2190 Kircher**

Lot 27, Assessor's Plat No. 2 Subdivision, as recorded in Liber 47, Page 12, Oakland County Records; Property Tax Parcel ID: 18-02-479-048; Commonly Known As: **2438 Willow Beach Street**

7. That Defendants, RALPH ROBERTS REALTY, LLC, RALPH ROBERTS, and HEATHER ELIASZ, wrongfully recorded Claims of Interest in each of the above referenced properties. (See attached Exhibit "A").

8. That these Claims of Interest were wrongfully recorded against the properties for the sole purpose of extortion, vexation, and to otherwise frustrate the interests of Plaintiff, HOME VENTURES ENTERPRISES, LLC, the rightful owner of the properties.

9. That the Defendants, at the time of recording the Claims of Interest, knew that these Claims of Interest were wrongful, and still went ahead and recorded these Claims of Interest putting a cloud of title on each property.

10. That the recording of these Claims of Interest was done maliciously by the Defendants.

COUNT I - QUIET TITLE PURSUANT TO MCL 600.2932 AND MCR 3.411

11. That this lawsuit is required to quiet title and extinguish and discharge the interests of the Defendant, RALPH ROBERTS REALTY, LLC, and prevent the cloud on title that the Claims of Interest filed have created.

12. That the Plaintiff is requesting an Order extinguishing and discharging all interest that Defendant, RALPH ROBERTS REALTY, LLC, may have in the above referenced properties.

WHEREFORE, Plaintiff respectfully requests this Honorable Court enter an Order and Quiet Title Judgment that the interests of the Defendant, RALPH ROBERTS REALTY, LLC, in the above properties hereby be extinguished, released and forever discharged.

COUNT II - SLANDER OF TITLE PURSUANT TO MCL 565.101 ET SEQ.

13. Plaintiff hereby incorporates by reference each and every prior allegation as if fully set forth herein.

14. That MCL 565.101 et seq. states that:

"No person should use the privilege of filing notices for the purpose of slandering the title to land, in any action brought for the purpose of quieting title to land, if the court shall find that any person has filed a claim for that reason only, he shall award the plaintiff all the costs of such action, including such attorney's fees as the court may allow to the plaintiff and in addition, shall decree that the defendant asserting such claim shall pay to plaintiff all damages that plaintiff may have sustained as a result of such notice of claim having been so filed for record."

14. That due to Defendants' wrongful recording of the Claims of Interest which amounts to a slandering of title, Plaintiff should be compensated for the expense of having to remove said cloud on title, as well as any consequential damages that flow from the wrongful clouding of title.

WHEREFORE, Plaintiff respectfully request this Honorable Court to enter Judgment for Plaintiff and against Defendants jointly and severally, for any costs and damages incurred by Plaintiff for having to bring the action for quieting title and any consequential damages that flowed from the clouding of title.

COUNT III - COMMON LAW SLANDER OF TITLE

15. Plaintiff hereby incorporates by reference each and every prior allegation as if fully set forth herein.

16. That the Defendants' filing of the Claims of Interest was a malicious publication of false statements that disparage the Plaintiff's right in the above stated properties.

WHEREFORE, Plaintiff respectfully request this Court to enter Judgment for Plaintiff and against Defendants, jointly and severally, for any costs and damages incurred by Plaintiff for having to bring the action for quieting title and any consequential damages that flowed from the clouding of title.

Respectfully submitted,

LAW OFFICES OF BLAKE P. LIPMAN

Dated: October 3, 2013

By:

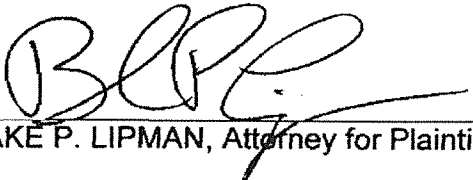

BLAKE P. LIPMAN, Attorney for Plaintiff

EXHIBIT A

RECEIVED
OAKLAND COUNTY
REGISTER OF DEEDS

2013 JUL 16 AM 8:49

LIBER 46067 PAGE 485
\$13.00 MISC RECORDING
\$4.00 REMONUMENTATION
07/16/2013 11:05:52 AM RECEIPT# 99711
PAID RECORDED - Oakland County, MI
Lisa Brown, Clerk/Register of Deeds

CLAIM OF INTEREST

Received for Filing, Oakland County Clerk 2013 OCT 08 PM 12:07

Notice is hereby given that Ralph Roberts Realty, LLC ("Realty") 12900 Hall Road, Suite 190, Sterling Heights, MI 48313 has entered into an agreement with Home Ventures Enterprises, LLC pursuant to which Realty has been granted an interest in the property described on Exhibit "A" (the "Property").

Under the terms of said agreement Realty is entitled to market and manage the Property and has been assigned a share of the proceeds of any sale or disposition of the Property.

IN WITNESS WHEREOF, this Notice is executed the 15th day of July, 2013

Heather Eliaz
By: Heather Eliaz, Acting Agent for
Ralph Roberts Realty, LLC

State of Michigan
County of Macomb

Acknowledged before me this 15 day of July, 2013, by Heather Eliaz of Ralph Roberts Realty, LLC

JESSICA E. RICE
Notary Public, State of Michigan
County of Washtenaw
My Commission Expires Apr. 20, 2017
Acting in the County of Macomb

Jess E Rice
State of MI Notary Public
Washtenaw County, Michigan
My Commission Expires: 4/20/17
Acting in the County of Macomb

EXHIBIT A

DESCRIPTION OF REAL ESTATE

Legal Description: Lot 27, Assessor's Plat No. 2 Subdivision, as recorded in Liber 47, Page 12, Oakland County Records.

Property Tax Parcel ID: 18-02-479-048

Commonly known as: 2438 Willow Beach Street, Keego Harbor, MI 48320

Received for Filing Oakland County Clerk 2013 OCT 08 PM 12:07

RECEIVED
OAKLAND COUNTY
REGISTER OF DEEDS

113 JUL 16 AM 8:49

LIBER 46067 PAGE 483
\$13.00 MISC RECORDING
\$4.00 REMONUMENTATION
07/16/2013 11:05:52 AM RECEIPT# 9971
PAID RECORDED - Oakland County, MI
Lisa Brown, Clerk/Register of Deeds

CLAIM OF INTEREST

Received for Filing Oakland County Clerk 2013 OCT 08 PM 12:07

Notice is hereby given that Ralph Roberts Realty, LLC ("Realty") 12900 Hall Road, Suite 190, Sterling Heights, MI 48313 has entered into an agreement with Home Ventures Enterprises, LLC pursuant to which Realty has been granted an interest in the property described on Exhibit "A" (the "Property").

Under the terms of said agreement Realty is entitled to market and manage the Property and has been assigned a share of the proceeds of any sale or disposition of the Property.

IN WITNESS WHEREOF, this Notice is executed the 15th day of July, 2013

Heather Eliaz
By: Heather Eliaz, Acting Agent for
Ralph Roberts Realty, LLC

State of Michigan
County of Macomb

Acknowledged before me this 15 day of July, 2013, by Heather Eliaz of Ralph Roberts Realty, LLC

JESSICA E. RICE
Notary Public, State of Michigan
County of Washtenaw
My Commission Expires Apr. 20, 2017
Acting in the County of Macomb

Jessie Ricci
State of MI, Notary Public
Washtenaw County, Michigan
My Commission Expires: 4/20/17
Acting in the County of Macomb

EXHIBIT A

DESCRIPTION OF REAL ESTATE

Legal Description: The East 150 feet of the West 350 feet of Lot 56, of Galloway Lake Farms Subdivision, according to the Plat thereof, as recorded in Liber 31, Page 2 of Plats, Oakland County Records.

Property Tax Parcel ID: 14-14-303-018

Commonly known as: 2190 Kircher

Received for Filing Oakland County Clerk 2013 OCT 08 PM 12:07

LIBER 45757 PAGE 602

0126724

RECEIVED
OAKLAND COUNTY
REGISTER OF DEEDS

2013 MAY -7 AM 8:42

LIBER 45757 PAGE 553
\$13.00 MISC RECORDING
\$4.00 REMONUMENTATION
05/07/2013 08:55:49 AM RECEIPT# 64096
PAID RECORDED - Oakland County, MI
Lisa Brown, Clerk/Register of Deeds

CLAIM OF INTEREST

Notice is hereby given that Ralph Roberts Realty, LLC ("Realty") 12900 Hall Road, Suite 190, Sterling Heights, MI 48313 has entered into an agreement with HOME VENTURES ENTERPRISES LLC pursuant to which Realty has been granted an interest in the property described on Exhibit "A" (the "Property").

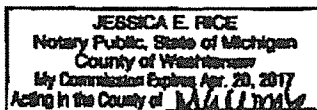
Under the terms of said agreement Realty is entitled to market and manage the Property and has been assigned a share of the proceeds of any sale or disposition of the Property.

IN WITNESS WHEREOF, this Notice is executed the 6th of May, 2013.

Heather Eliaz
By: Heather Eliaz, Acting Agent for
Ralph Roberts Realty, LLC

State of Michigan
County of Macomb

Acknowledged before me this 6 day of May, 2013, by Heather Eliaz, ^{acting agent} of Ralph Roberts Realty, LLC



Jessie Rice
State of MI, Notary Public
Washburn County, Michigan
My Commission Expires: 4/20/17
Acting in the County of Macomb

Prepared by and return to:
Heather Eliaz
Ralph Roberts Realty, LLC
42490 Garfield Rd. Ste.202
Clinton Twp., MI 48093

OK - AN

EXHIBIT A

DESCRIPTION OF REAL ESTATE

Legal Description: Lot 35, Royal Oak Manor Subdivision, according to the plat thereof as recorded in Liber 17, Page(s) 7 of Plats, Oakland County Records.

Property Tax Parcel ID: 25-15-128-003

Commonly known as: 508 Dewey Street

RECEIVED -
OAKLAND COUNTY
REGISTER OF DEEDS

2013 MAY -7 AM 8:43

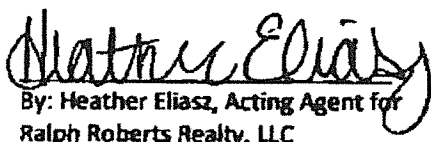
LIBER 45757 PAGE 555
\$13.00 MISC RECORDING
\$4.00 REMONUMENTATION
05/07/2013 08:55:49 AM RECEIPT# 64096
PAID RECORDED - Oakland County, MI
Lisa Brown, Clerk/Register of Deeds

CLAIM OF INTEREST

Notice is hereby given that Ralph Roberts Realty, LLC ("Realty") 12900 Hall Road, Suite 190, Sterling Heights, MI 48313 has entered into an agreement with HOME VENTURES ENTERPRISES LLC pursuant to which Realty has been granted an interest in the property described on Exhibit "A" (the "Property").

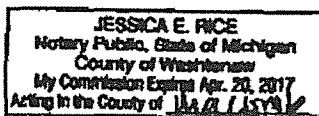
Under the terms of said agreement Realty is entitled to market and manage the Property and has been assigned a share of the proceeds of any sale or disposition of the Property.


IN WITNESS WHEREOF, this Notice is executed the 6th of May, 2013.


By: Heather Eliaz, Acting Agent for
Ralph Roberts Realty, LLC

State of Michigan
County of Macomb

Acknowledged before me this 6 day of May, 2013, by Heather Eliaz ^{acting agent} of Ralph Roberts Realty, LLC 




State of MI, Notary Public
Washington County, Michigan
My Commission Expires: 4/20/17
Acting in the County of Macomb

Prepared by and return to:
Heather Eliaz
Ralph Roberts Realty, LLC
42490 Garfield Rd. Ste.202
Clinton Twp., MI 48093

OK - AN

EXHIBIT A

DESCRIPTION OF REAL ESTATE

Legal Description: West 15 feet of Lot 7, all of Lot 8, Block 23, also one half of the vacated alley adjacent to the same – Urbanrest Subdivision, as recorded in Liber 4, on Page 22 of Plats, Oakland County Records

Property Tax Parcel ID: 25-27-484-009

Commonly known as: 566 E Breckenridge St

LIBER 46009 PAGE 145

0176257

RECEIVED
OAKLAND COUNTY
REGISTER OF DEEDS

2013 JUL -2 AM 8:37


LIBER 46009 PAGE 145
\$13.00 MISC RECORDING
\$4.00 REMONUMENTATION
07/02/2013 08:41:46 AM RECEIPT# 93122
PAID RECORDED - Oakland County, MI
Lisa Brown, Clerk/Register of Deeds

CLAIM OF INTEREST

Notice is hereby given that Ralph Roberts Realty, LLC ("Realty") 12900 Hall Road, Suite 190, Sterling Heights, MI 48313 has entered into an agreement with HOME VENTURES ENTERPRISES LLC pursuant to which Realty has been granted an interest in the property described on Exhibit "A" (the "Property").

Under the terms of said agreement Realty is entitled to market and manage the Property and has been assigned a share of the proceeds of any sale or disposition of the Property.

IN WITNESS WHEREOF, this Notice is executed the 18th of May, 2013



By: Heather Eliaz, Acting Agent for
Ralph Roberts Realty, LLC

(20)

State of Michigan
County of Oakland

Acknowledged before me this 1 day of July, 2013, by Heather Eliaz of Ralph Roberts Realty, LLC

MICHELLE L. ARNOLD
NOTARY PUBLIC, STATE OF MI
COUNTY OF OAKLAND
MY COMMISSION EXPIRES JAN 8, 2016
ACTING IN COUNTY OF Oakland


Michelle L. Arnold, Notary Public
Oakland County, Michigan
My Commission Expires: 1/8/2016
Acting in the County of Oakland

Prepared by and return to:
Heather Eliaz
Ralph Roberts Realty, LLC
42490 Garfield Rd. Ste.202
Clinton Twp., MI 48093

OK - AN

LIBER 46009 PAGE 148

EXHIBIT A

DESCRIPTION OF REAL ESTATE

Legal Description: The Easterly $\frac{1}{4}$ of Lot 98, all of Lot 99, including $\frac{1}{4}$ of the vacated public alley at the rear thereof, Mapledale Subdivision, as recorded in Liber 11, Page 14, of Plats, Oakland County Records.

Property Tax Parcel ID: 25-26-154-034

Commonly known as: 1521 Annabelle Street

RECEIVED
OAKLAND COUNTY
REGISTER OF DEEDS

2013 JUL 16 AM 8:50

LIBER 46067 PAGE 489
\$13.00 MISC RECORDING
\$4.00 REMONUMENTATION
07/16/2013 11:05:32 AM RECEIPT# 99711
PAID RECORDED - Oakland County, MI
Lisa Brown, Clerk/Register of Deeds

CLAIM OF INTEREST

Notice is hereby given that Ralph Roberts Realty, LLC ("Realty") 12900 Hall Road, Suite 190, Sterling Heights, MI 48313 has entered into an agreement with Home Ventures Enterprises, LLC pursuant to which Realty has been granted an interest in the property described on Exhibit "A" (the "Property").

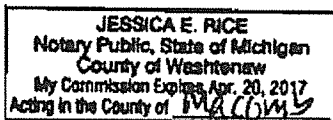
Under the terms of said agreement Realty is entitled to market and manage the Property and has been assigned a share of the proceeds of any sale or disposition of the Property.


IN WITNESS WHEREOF, this Notice is executed the 15th day of July, 2013


By: Heather Eliaz, Acting Agent for
Ralph Roberts Realty, LLC

State of Michigan
County of Macomb

Acknowledged before me this 15 day of July, 2013, by Heather Eliaz of Ralph Roberts Realty, LLC




State of MI Notary Public
Washtenaw County, Michigan
My Commission Expires: 4/20/17
Acting in the County of Macomb

Prepared by and return to:
Heather Eliaz
Ralph Roberts Realty, LLC
42490 Garfield Rd. Ste. 202
Clinton Twp., MI 48093

OK - MH

EXHIBIT A

DESCRIPTION OF REAL ESTATE

Legal Description: All that certain lot or parcel of land, more fully described and designated as Lot 342 in that part hereof known as Richland Gardens Subdivision, in the City of Farmington, Michigan and which said lot measures and is located as follows: North one half of the vacated Liberty Avenue adjacent, Richland Gardens Subdivision, as recorded in Liber 19, Page 29, Oakland County Records.

Property Tax Parcel ID: 23-36-178-011

Commonly known as: 21716 Hamilton Avenue

RECEIVED
OAKLAND COUNTY
REGISTER OF DEEDS

2013 JUL 16 AM 8:50

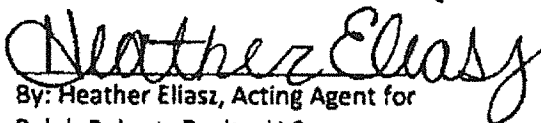
LIBER 48067 PAGE 491
\$13.00 MISC RECORDING
\$4.00 REMONUMENTATION
07/16/2013 11:05:52 AM RECEIPT# 99711
PAID RECORDED - Oakland County, MI
Lisa Brown, Clerk/Register of Deeds

CLAIM OF INTEREST

Notice is hereby given that Ralph Roberts Realty, LLC ("Realty") 12900 Hall Road, Suite 190, Sterling Heights, MI 48313 has entered into an agreement with Home Ventures Enterprises, LLC pursuant to which Realty has been granted an interest in the property described on Exhibit "A" (the "Property").

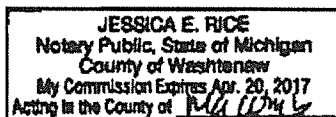
Under the terms of said agreement Realty is entitled to market and manage the Property and has been assigned a share of the proceeds of any sale or disposition of the Property.


IN WITNESS WHEREOF, this Notice is executed the 15th day of July, 2013


By: Heather Eliaz, Acting Agent for
Ralph Roberts Realty, LLC

State of Michigan
County of Macomb

Acknowledged before me this 15 day of July, 2013, by Heather Eliaz of Ralph Roberts Realty, LLC




State of MI, Notary Public
Washtenaw County, Michigan
My Commission Expires: 4/20/17
Acting in the County of Macomb

Prepared by and return to:
Heather Eliaz
Ralph Roberts Realty, LLC
42490 Garfield Rd. Ste.202
Clinton Twp., MI 48093

OK - MH

EXHIBIT A

DESCRIPTION OF REAL ESTATE

Legal Description: Unit 7-D, Building 7 Franklin Village Townhouse Condominium, according to the Master Deed recorded in Liber 5665, Page 282 as amended, Oakland County Records and designated as Oakland Condominium Subdivision Plan No. 23 together with rights in general common elements and limited common elements as set forth in the above described Master Deed and as described in Act 59 of the Public Acts of 1978, as amended.

Property Tax Parcel ID: 24-08-378-055 *Apt 7D*

Commonly known as: 29115 Village Rd

RECEIVED
OAKLAND COUNTY
REGISTER OF DEEDS

2013 MAY -7 AM 8:45

LIBER 45757 PAGE 561
\$13.00 MISC RECORDING
\$4.00 REMONUMENTATION
05/07/2013 08:55:49 AM RECEIPT# 64096
PAID RECORDED - Oakland County, MI
Lisa Brown, Clerk/Register of Deeds

CLAIM OF INTEREST

Notice is hereby given that Ralph Roberts Realty, LLC ("Realty") 12900 Hall Road, Suite 190, Sterling Heights, MI 48313 has entered into an agreement with HOME VENTURES ENTERPRISES LLC pursuant to which Realty has been granted an interest in the property described on Exhibit "A" (the "Property").

Under the terms of said agreement Realty is entitled to market and manage the Property and has been assigned a share of the proceeds of any sale or disposition of the Property.

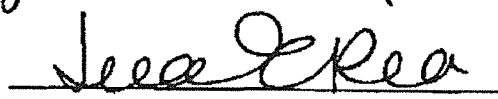
IN WITNESS WHEREOF, this Notice is executed the 6th of May, 2013.


By: Heather Eliaz, Acting Agent for
Ralph Roberts Realty, LLC

State of Michigan
County of Macomb

Acknowledged before me this 6 day of May, 2013, by Heather Eliaz ^{acting agent} of Ralph Roberts Realty, LLC

JESSICA E. RICE
Notary Public, State of Michigan
County of Washtenaw
My Commission Expires Apr. 20, 2017
Acting in the County of


State of MI, Notary Public
Washtenaw County, Michigan
My Commission Expires: 4/20/17
Acting in the County of Macomb

Prepared by and return to:
Heather Eliaz
Ralph Roberts Realty, LLC
42490 Garfield Rd. Ste.202
Clinton Twp., MI 48093

OK - AN

EXHIBIT A

DESCRIPTION OF REAL ESTATE

Legal Description: The South ½ of Lot 14, Klett's Garden Estates Subdivision, as recorded in Liber 14, Page 56 of Plats, Oakland County Records

Property Tax Parcel ID: 24-32-128-016

Commonly known as: 22332 Nancy Ave Southfield, MI

RECEIVED
OAKLAND COUNTY
REGISTER OF DEEDS

2013 JUL 16 AM 8:50

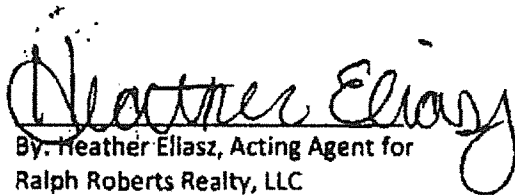
LIBER 46067 PAGE 493
\$13.00 MISC RECORDING
\$4.00 REMONUMENTATION
07/16/2013 11:05:52 AM RECEIPT# 99711
PAID RECORDED - Oakland County, MI
Lisa Brown, Clerk/Register of Deeds

CLAIM OF INTEREST

Notice is hereby given that Ralph Roberts Realty, LLC ("Realty") 12900 Hall Road, Suite 190, Sterling Heights, MI 48313 has entered into an agreement with Home Ventures Enterprises, LLC pursuant to which Realty has been granted an interest in the property described on Exhibit "A" (the "Property").

Under the terms of said agreement Realty is entitled to market and manage the Property and has been assigned a share of the proceeds of any sale or disposition of the Property.


IN WITNESS WHEREOF, this Notice is executed the 15th day of July, 2013


By: Heather Eliaz, Acting Agent for
Ralph Roberts Realty, LLC

State of Michigan
County of Macomb

Acknowledged before me this 15 day of July, 2013, by Heather Eliaz of Ralph Roberts Realty, LLC

JESSICA E. RICE
Notary Public, State of Michigan
County of Washtenaw
My Commission Expires Apr. 20, 2017
Acting in the County of Macomb


State of MI, Notary Public
Washtenaw County, Michigan
My Commission Expires: 4/20/17
Acting in the County of Macomb

Prepared by and return to:
Heather Eliaz
Ralph Roberts Realty, LLC
42490 Garfield Rd. Ste.202
Clinton Twp., MI 48093

OK - AMH

EXHIBIT A

DESCRIPTION OF REAL ESTATE

Legal Description: Lots 9 through 12, Block 46, Carroll Lake Heights Subdivision Number 1, as recorded in Liber 29, Pages 1 through 1A of Plats, Oakland County Records.

Property Tax Parcel ID: 17-03-401-012 & 17-03-401-011

Commonly known as: 5609 Paradise Street

lots 9+10

lots 11+12

RECEIVED
OAKLAND COUNTY
REGISTER OF DEEDS

2013 JUL -2 AM 8:37

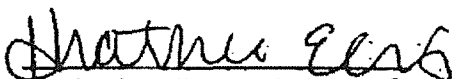
LIBER 46009 PAGE 147
\$13.00 MISC RECORDING
\$4.00 REMONUMENTATION
07/02/2013 08:41:46 AM RECEIPT# 93122
PAID RECORDED - Oakland County, MI
Lisa Brown, Clerk/Register of Deeds

CLAIM OF INTEREST

Notice is hereby given that Ralph Roberts Realty, LLC ("Realty") 12900 Hall Road, Suite 190, Sterling Heights, MI 48313 has entered into an agreement with HOME VENTURES ENTERPRISES LLC pursuant to which Realty has been granted an interest in the property described on Exhibit "A" (the "Property").

Under the terms of said agreement Realty is entitled to market and manage the Property and has been assigned a share of the proceeds of any sale or disposition of the Property.

IN WITNESS WHEREOF, this Notice is executed the 18th of May, 2013

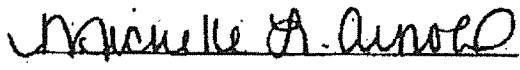

By: Heather Eliaz, Acting Agent for
Ralph Roberts Realty, LLC

(28)
R

State of Michigan
County of Oakland

Acknowledged before me this 1 day of July, 2013, by Heather Eliaz of Ralph Roberts Realty, LLC

MICHELLE L. ARNOLD
NOTARY PUBLIC, STATE OF MI
COUNTY OF OAKLAND
MY COMMISSION EXPIRES JUN 8, 2016
ACTING IN COUNTY OF Oakland


Michelle L. Arnold, Notary Public,
Oakland County, Michigan
My Commission Expires: 6/8/2016
Acting in the County of Oakland

Prepared by and return to:
Heather Eliaz
Ralph Roberts Realty, LLC
42490 Garfield Rd. Ste. 202
Clinton Twp., MI 48093

OK - AN

EXHIBIT A

DESCRIPTION OF REAL ESTATE

Legal Description: Lot 564, Grand River Crest Subdivision No. 2, as recorded in Liber 30, Page 2 of Plats

Property Tax Parcel ID: 23-36-426-022

Commonly known as: 21315 Saint Francis St

LIBER 45757 PAGE 563

0126729

RECEIVED
OAKLAND COUNTY
REGISTER OF DEEDS

2013 MAY -7 AM 8:45

Blaker Caprin
Attor
225-3171
13/AN
#140
2PM

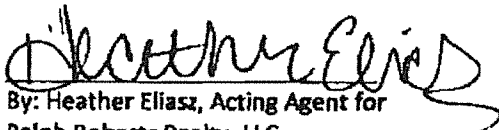
LIBER 45757 PAGE 563
\$13.00 MISC RECORDING
\$4.00 REMONUMENTATION
05/07/2013 08:55:49 AM RECEIPT# 64096
PAID RECORDED - Oakland County, MI
Lisa Brown, Clerk/Register of Deeds

CLAIM OF INTEREST

Notice is hereby given that Ralph Roberts Realty, LLC ("Realty") 12900 Hall Road, Suite 190, Sterling Heights, MI 48313 has entered into an agreement with HOME VENTURES ENTERPRISES LLC pursuant to which Realty has been granted an interest in the property described on Exhibit "A" (the "Property").

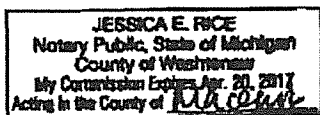
Under the terms of said agreement Realty is entitled to market and manage the Property and has been assigned a share of the proceeds of any sale or disposition of the Property.


IN WITNESS WHEREOF, this Notice is executed the 6th of May, 2013.


By: Heather Elias, Acting Agent for
Ralph Roberts Realty, LLC

State of Michigan
County of Macomb

Acknowledged before me this 6 day of May, 2013, by Heather Elias of Ralph Roberts Realty, LLC *acting agent*




Jessica E. Rice
State of MI, Notary Public
Westland County, Michigan
My Commission Expires: 4/20/17
Acting in the County of Macomb

Prepared by and return to:
Heather Elias
Ralph Roberts Realty, LLC
42490 Garfield Rd. Ste.202
Clinton Twp., MI 48093

OK - AN

EXHIBIT A

DESCRIPTION OF REAL ESTATE

Legal Description: East 20 feet off lot 114 and the West 20 feet of Lot 115 and $\frac{1}{4}$ vacated alley at the rear thereof, Mapledale Subdivison, of the East $\frac{1}{4}$ of the Northwest $\frac{1}{4}$ of section 26, Town 1 North, Range 11 East, Oakland County, Michigan, as recorded in Liber 11 of Plats, Page 14, Oakland County Records.

Property Tax Parcel ID: 25-26-154-045

Commonly known as: 1709 Annabelle Street

Received for Filing Oakland County Clerk 2013 OCT 08 PM 12:07

RECEIVED
OAKLAND COUNTY
REGISTER OF DEEDS

2013 JUL 16 AM 8:50

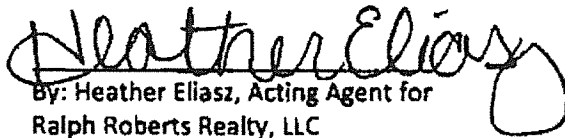
LIBER 46067 PAGE 487
\$13.00 MISC RECORDING
\$4.00 REMONUMENTATION
07/16/2013 11:05:52 AM RECEIPT# 99711
PAID RECORDED - Oakland County, MI
Lisa Brown, Clerk/Register of Deeds

CLAIM OF INTEREST

Notice is hereby given that Ralph Roberts Realty, LLC ("Realty") 12900 Hall Road, Suite 190, Sterling Heights, MI 48313 has entered into an agreement with Home Ventures Enterprises, LLC pursuant to which Realty has been granted an interest in the property described on Exhibit "A" (the "Property").

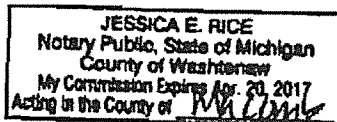
Under the terms of said agreement Realty is entitled to market and manage the Property and has been assigned a share of the proceeds of any sale or disposition of the Property.


IN WITNESS WHEREOF, this Notice is executed the 15th day of July, 2013


By: Heather Eliaz, Acting Agent for
Ralph Roberts Realty, LLC

State of Michigan
County of Macomb

Acknowledged before me this 15 day of July, 2013, by Heather Eliaz of Ralph Roberts Realty, LLC




Washtenaw County, Michigan
My Commission Expires: 4/20/17
Acting in the County of Macomb

Prepared by and return to:
Heather Eliaz
Ralph Roberts Realty, LLC
42490 Garfield Rd. Ste.202
Clinton Twp., MI 48093

OK - AH

EXHIBIT A

DESCRIPTION OF REAL ESTATE

Legal Description: Lot 82 Fern Ridge Subdivision, as recorded in Liber 30, Page 8 of Plats, Oakland County Records.

Property Tax Parcel ID: 25-28-377-007

Commonly known as: 23230 Sherman Street

STATE OF MICHIGAN
JUDICIAL DISTRICT
6th JUDICIAL CIRCUIT
COUNTY PROBATE

SUMMONS AND COMPLAINT

CASE NO.

-CH

Court address

1200 N. Telegraph Rd., Dept. 404, Pontiac, MI 48341-0404

Court telephone no.

(248) 858-1000

Plaintiff's name(s), address(es), and telephone no(s).

HOME VENTURES ENTERPRISES, LLC, a Michigan
Limited Liability Company
4301 Orchard Lake Road, Suite 180
West Bloomfield, Michigan 48323

v

Defendant's name(s), address(es), and telephone no(s).

RALPH ROBERTS REALTY, LLC, a Michigan Limited
Liability Company, RALPH ROBERTS, Individually, and
HEATHER ELIASZ, Individually
12900 Hall Road, Suite 190
Sterling Heights, Michigan 48313

Plaintiff's attorney, bar no., address, and telephone no.

BLAKE P. LIPMAN (P-52652)
31275 Northwestern Hwy., Suite 140
Farmington Hills, Michigan 48334
(248) 851-3171**SUMMONS** NOTICE TO THE DEFENDANT: In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons to file a written answer with the court and serve a copy on the other party or take other lawful action with the court (28 days if you were served by mail or you were served outside this state). (MCR 2.111(C))
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.

Issued	This summons expires	Court clerk
--------	----------------------	-------------

*This summons is invalid unless served on or before its expiration date.

This document must be sealed by the seal of the court.

COMPLAINT Instruction: The following is information that is required to be in the caption of every complaint and is to be completed by the plaintiff. Actual allegations and the claim for relief must be stated on additional complaint pages and attached to this form.

Family Division Cases

- ☐ There is no other pending or resolved action within the jurisdiction of the family division of circuit court involving the family or family members of the parties.
- ☐ An action within the jurisdiction of the family division of the circuit court involving the family or family members of the parties has been previously filed in _____ Court.
- The action ☐ remains ☐ is no longer pending. The docket number and the judge assigned to the action are:

Docket no.	Judge	Bar no.
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General Civil Cases

- ☒ There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- ☐ A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has been previously filed in _____ Court.
- The action ☐ remains ☐ is no longer pending. The docket number and the judge assigned to the action are:

Docket no.	Judge	Bar no.
------------	-------	---------

VENUE

Plaintiff(s) residence (include city, township, or village) West Bloomfield, Michigan	Defendant(s) residence (include city, township, or village) Sterling Heights, Michigan
Place where action arose or business conducted Oakland County	

10/03/2013

Date

Signature of attorney/plaintiff

If you require special accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

MC 01 (3/08) **SUMMONS AND COMPLAINT** MCR 2.102(B)(11), MCR 2.104, MCR 2.105, MCR 2.107, MCR 2.113(C)(2)(a), (b), MCR 3.206(A)